

### **REMARKS**

The claims are currently amended in order to emphasize that both the second control interface and the gateway device are located in the core network. This introduces no new matter, and is fully supported by the application as originally filed.

Present claim 1 says that the second interface connects the network control device and the gateway device, which are both located in the core network, and thus the second control interface is within the core network ***instead of*** between the core and access networks. Also, according to present claim 1, the gateway device is located in the core network ***instead of*** in the access network. These features plainly distinguish present the independent claims from the *Lupien* reference.

### **Further Differences Between the Claimed Invention and *Lupien***

Page three of the Office Action states that the present claimed core network is equivalent to the packet data network (34) in *Lupien*. However, in the next paragraph it is argued that the core network comprises SGSN (32) and GGSN (33) as a gateway device in the same figure.

An additional contradiction in the Office Action is that, although the EIR should be part of the core network, that is not true according to the Office Action. The EIR does not control the gateway device, but rather controls the usage of mobile equipment.

Applicant also respectfully points out that *Lupien*'s radio network (ANSI-41) is not directly connected to the core network (packet network). It is not even connected to the SGSN and GGSN, but to the GPRS-VLR and IW GPRS-BSC. ANSI-41 is not a radio access network, but a full mobile network consisting also of core network elements (MSC and HLR). Furthermore, *Lupien*'s second interface does not come from the core network (packet network 34).

Applicant also note that it is not said that the Gf interfaces convey control information for controlling the gateway device. EIR only receives information through the gateway.

The EIR is not connected to GGSN, but nevertheless the gateway is said to be consisting of both GGSN and SGSN in the prior art.

With regard to page four of the office action, there is no case where user data would ever go through EIR in the current systems. User data is not coming directly from the radio access network to the gateway device (SGSN, GGSN) but through the GPRS-VLR and IW GPRS-BSC. A person of ordinary skill would not assume that audio and video signals are transmitted over GPRS packet data network. EIR, i.e., network control device, does not control the radio access network (no connection).

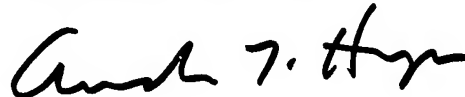
Page eight of the Office Action include GPRS-BSC as part of the gateway, but earlier gateway is comprised only of SGSN and GGSN. Regarding *Lupien*, it is presumed that the radio access network (IS-41) is on the left-hand side of the dotted line. This means that GPRS-BSC is part of the GPRS network on the right-hand side in the figure. So it would not be part of the RAN. However, GPRS networks typically have functionalities both in the RAN and CN sides. In *Lupien*, IS-41 is adapted to GPRS CV with some GPRS elements. It does not teach where the CN boundaries exist in the right-hand side. In the GPRS specifications, SGSN is part of the CN but BSC is part of the RAN.

Furthermore, Applicant respectfully submits that the Office Action is incorrect in dealing with EIR. The EIR of *Lupien* does not transmit control information to a gateway. Even if “authorization of the mobile equipment is essential for the system operation,” the EIR does not transmit any control information to a gateway. It is technically incorrect to classify an Equipment Identify Register (EIR) as a device controlling a gateway. This is not the function of EIR. Further a BSC 39 of *Lupien* is no gateway device.

CONCLUSION

The rejections of the official action having been obviated by amendment or shown to be inapplicable, withdrawal thereof is requested and passage of the pending claims to issue is earnestly solicited.

Respectfully submitted,



Andrew T. Hyman  
Attorney for the Applicant  
Registration No. 45,858

March 1, 2006  
ATH/mbh  
WARE, FRESSOLA, VAN DER SLUYS  
& ADOLPHSON LLP  
755 Main Street, PO Box 224  
Monroe CT 06468  
(203) 261-1234